

*HIGHLIGHTED IN BLUE IS THE TEXT THAT PLAINTIFFS SEEK TO WHICH
DEFENDANTS OBJECT; HIGHLIGHTED IN YELLOW IS THE TEXT
THAT DEFENDANTS SEEK TO WHICH PLAINTIFFS OBJECT*

Sokolow, *et al.* v. The Palestine Liberation Organization, *et al.*
04 Civ. 00397 (GBD) (RLE)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,

Plaintiffs,

vs.

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**JOINT PROPOSED JURY
QUESTIONNAIRE**

HON. GEORGE B. DANIELS
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
500 PEARL STREET
NEW YORK, NY 11201

JURORS ARE INSTRUCTED TO CALL: 202-805-_____

ON JANUARY 9, 2015, AFTER 4:30 P.M.

FOR FURTHER REPORTING INSTRUCTIONS

IT IS **EXTREMELY** IMPORTANT THAT YOU KNOW THE
JUROR NUMBER WRITTEN ON THE TOP OF THIS FORM
WHEN YOU MAKE YOUR CALL.

THANK YOU.

JUROR # _____

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JUROR QUESTIONNAIRE

**THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED
ONLY TO THE APPROPRIATE COURT PERSONNEL
AS DIRECTED BY THE PRESIDING JUDGE**

This information will be maintained by the Court Clerk solely for court administrative purposes.

Please print the following information in blue or black ink:

Name: _____

Home Address _____

Home Phone: _____

Cellular Phone: _____

Job & Department: _____

Business Address: _____

Business Phone (Including Extensions): _____

Business Fax: _____

I hereby declare, under penalty of perjury, that the foregoing information, and all of the answers in this questionnaire, are true, correct, and complete to the best of my knowledge, and that I have answered all of the questions myself. I further certify that I have not discussed my answers with others or received assistance in completing this questionnaire.

Date: December __, 2014

SIGNATURE

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JUROR QUESTIONNAIRE

JUDGE'S PRELIMINARY INSTRUCTIONS TO PROSPECTIVE JURORS

Please complete the following questionnaire to assist the Court and counsel in selecting the jury to serve in this case. If there is not enough space provided for you to complete your answer, please continue it on the blank page at the back of the questionnaire.

Please do not discuss the questionnaire or your answers with anyone. It is very important that the answers be yours and yours alone. Remember, there are no "right" or "wrong" answers. What is needed is your very best, honest effort to answer the questions contained in this booklet. You are expected to sign your questionnaire, and your answers will have the effect of a statement given to the court under oath.

The purpose of this questionnaire is not to ask unnecessarily about personal matters but to encourage your full expression and candor so that both the plaintiffs and the defendants will have a meaningful opportunity to select a fair and impartial jury to try the issues of the case.

Your full cooperation is of vital importance.

Do not leave any answer blank. Please answer **all** questions, writing as legibly as possible, and answering as accurately, completely, and as reasonably as you can. If a question does not apply to you, fill in the space with an "N/A" for "not applicable." Please answer each question by placing an "X" next to the correct response or by providing the information requested. If you require additional space for your responses or wish to make further comments regarding any of your answers, use the margins or the extra sheets at the end **and indicate the question number** to which you are responding. Remember, complete answers are more helpful than incomplete answers. Since we will be making copies of this questionnaire, **do not write on the back of any page.**

If you feel that any question requires an answer which is too sensitive (personal or private) to be included in a public record or discussed in open court, simply write "private" in the left margin next to your answer, and the questioning on that topic will be held in private, out of the presence of the other prospective jurors. One of the benefits of a written questionnaire is that you need not answer the questions in front of the entire jury panel, as would otherwise be the case; however, follow-up questions to specific answers will be asked in open court.

Please write only your **assigned juror number** in the space provided at the top of **each**

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page as indicated.

Thank you in advance for your careful and honest response to the questionnaire.

JUDGE'S PRELIMINARY INSTRUCTIONS TO PROSPECTIVE JURORS

Upon your oath or affirmation, you must give true and complete answers to all questions in this questionnaire, which is designed to assist the judge in quickly selecting a fair and impartial jury. We realize that the questionnaire is lengthy, but its use will shorten the jury selection process, and, thus, your cooperation is vitally important. These questions are not meant to pry unnecessarily about personal matters, but rather, will help evaluate your ability to serve as a fair and impartial juror in this case. Part of the selection process depends on your ability and promise to follow the law as it is explained by the judge. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

Do not leave any answer blank. Please answer all questions, writing as legibly as possible, and answering as accurately, completely, and as reasonably as you can. If a question does not apply to you, fill in the space with an "N/A" for "not applicable." Please answer each question by placing an "X" next to the correct response or by providing the information requested. If you require additional space for your responses or wish to make further comments regarding any of your answers, use the margins or the extra sheets at the end and indicate the question number to which you are responding. Remember, complete answers are more helpful than incomplete answers. Since we will be making copies of this questionnaire, **do not write on the back of any page.**

Please write only your assigned juror number in the space provided at the top of each page as indicated. **Do not write your name.**

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The court instructs you not to discuss the questionnaire or your answers with your fellow jurors or anyone else. It is very important that the answers be yours and yours alone. Please answer as thoughtfully and candidly as possible. Your answers must be true and complete — they are the equivalent to statements under oath. This case involves sensitive issues about which we all may have opinions and feelings. It is of the utmost importance that you answer all questions without regard to how you think anyone else would answer the same question or whether your answer is popular or “correct.” Remember, there are no “right” or “wrong” answers. Honest answers are always correct.

You may have heard or learned something about this case before coming to court today. You are instructed that you may not seek out any additional information concerning this case, the plaintiffs, the defendants, the attorneys, or the court. You may not investigate or do any research concerning this case at any time by any means, including, but not limited to newspapers, magazines, or other print media, television, radio, and the Internet, regardless of how it may be accessed. The jury must decide the case based only on the evidence introduced in court and the court’s instructions on the law. Do not discuss the case with anyone, including your family, friends, co-workers and fellow jurors.

In many federal court cases, it is a common practice to keep the names and identities of the jurors in confidence. This is not unusual in any way. Experience has shown that, in a case like this, it is wise to take such steps as are necessary to make certain that the juror’s right to privacy is respected. Accordingly, we are following this procedure. The media and members of the public will be curious about the identity of the jurors, the witnesses, the lawyers, and all other participants, and may seek to inquire into their personal affairs. Anonymity will assure that the

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jury will not be exposed to such prying and to opinions, commentaries, and inquiries that might impair its ability to decide the case solely upon the evidence presented in court and upon the law as the court instructs. It is important to insure that the jury will in no way be influenced by the public, by the members of the media, and their articles and reports. The court emphasizes that it is taking these measures to protect your rights of privacy and to assist you in discharging your responsibility as jurors independently, fairly and impartially. It will also permit the media complete freedom of coverage of this trial.

To insure that your rights of privacy will be respected, only the second page of the attached questionnaire asks you to state your name and other identifying information. That page will be detached from the questionnaire when you have completed it and will be locked securely in the office of the Clerk of the Court to be disclosed only to appropriate court personnel as the judge directs. It will not be available to anyone, including the plaintiffs, the defendants or their attorneys. On the remaining pages of the questionnaire, you are instructed not to give names or addresses or any information that will permit anyone, even the judge, to identify you. **However, you must be sure to write the Juror Number assigned to you at the top of each page in the space provided.**

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SUMMARY OF THE CASE

The plaintiffs in this case allege that they or their loved ones were injured or killed by acts of terrorist violence that were directed at civilians in Israel and that the defendants are liable for those injuries or deaths.

The defendants deny the allegations and maintain that they did not provide material support to any of the individuals who committed the violent acts and that they are not liable for the injuries and deaths sustained by the plaintiffs.

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BACKGROUND QUESTIONS

1. What is your age: _____ Are you: ☐ Male ☐ Female
2. In what city, state and country were you born and raised?
Born: _____
Raised: _____
Raised (2): _____
3. If born outside the United States, are you a naturalized citizen? ☐ Yes ☐ No
If born outside of the United States, how long have you lived in the United States? _____
4. Where were your parents born?
Father: _____ Mother: _____
5. (a) Did you, your parents, your spouse, or your significant other (if applicable) immigrate to the United States? ☐ Yes ☐ No
(b) If, yes, please indicate who immigrated to the United States, and tell when and from where he or she immigrated to the United States:
(*please do not list the person's name*):

6. Where do you currently live?
County (e.g., Manhattan, Bronx, Westchester, Rockland, etc.): _____
City/town (e.g. Yonkers, White Plains, etc.): _____
Neighborhood (e.g. Washington Heights, Williamsbridge, etc.): _____
(a) How long have you lived at your present address? _____
(b) With whom do you live? _____

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- (c) In what other areas, states, cities, or neighborhoods have you lived in the past 15 years?

7. Do you or any of your immediate family members hold dual citizenship between the US and any other country?

☐ Yes (self) ☐ Yes (family) ☐ No

If yes, what is that person's relationship to you and which country?_____

8. What is your race and/or your ethnic background and that of your spouse, domestic partner or roommate (if applicable):

Yours:_____ Spouse/Partner/Roommate:_____

9. What is your marital status:

☐ Single ☐ Single, living with another person as a couple
☐ Divorced/Separated ☐ Single, living with a roommate(s)
☐ Married ☐ Widowed

10. Do you have any children, stepchildren or grandchildren: ☐ Yes ☐ No

If "yes" please indicate the following for each child, stepchild and grandchild (*please do not list the person's name*):

Age	M/F	Highest Education	Current Occupation	Lives with you?

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11. What is the highest level of education you have completed?

- | | |
|---|--|
| <input type="checkbox"/> less than high school (grade_____) | <input type="checkbox"/> four-year college degree |
| <input type="checkbox"/> high school/GED degree | <input type="checkbox"/> post college graduate studies |
| <input type="checkbox"/> some community/technical/business school | <input type="checkbox"/> graduate school degree |
| <input type="checkbox"/> two-year college degree | <input type="checkbox"/> other: _____ |

Please list your major areas of study or area of concentration and any degrees or certificates, licenses, etc. that you have received.

12. If you are married or living with someone, what is that person's highest level of education and area of study?

13. What is your employment status?

(Please check all that apply)

- | | | | |
|-------------|------------------------------------|---|---|
| Employed: | <input type="checkbox"/> full time | <input type="checkbox"/> part-time | <input type="checkbox"/> have more than one job |
| Unemployed: | <input type="checkbox"/> laid off | <input type="checkbox"/> looking for work | <input type="checkbox"/> not looking for work |
| Other: | <input type="checkbox"/> homemaker | <input type="checkbox"/> retired | <input type="checkbox"/> disabled |
| Student: | <input type="checkbox"/> full time | <input type="checkbox"/> part time | Studying: _____ |

14. What is your current occupation or most recent occupation—in other words, what type of work do you do and, if not currently working, what type of work were you doing previously? ***(Please do not list the name of the employer.)***

(a) What is your current job title and duties? _____

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(b) How long have you been in your present job? _____

(c) Are you self-employed or do you work for others? _____

(d) If self-employed, what type of business is it? _____

(e) Check the following category that best describes your employer:

- | | |
|---|---|
| <input type="checkbox"/> Private, for profit organization | <input type="checkbox"/> State government agency |
| <input type="checkbox"/> Private, not for profit organization | <input type="checkbox"/> County government agency |
| <input type="checkbox"/> Federal government agency | <input type="checkbox"/> City or local government |
| <input type="checkbox"/> Other: _____ | |

(f) Have you supervised others? ☐ Yes ☐ No

If yes, please describe what supervisory or management positions you held, the type of supervising and the number of people supervised.

(g) Have you ever owned your own business? ☐ Yes ☐ No

If yes, what type of business was it? _____

15. Please describe your occupations during the previous 15 years. If you have not worked in the last 15 years, please describe your most recent job. *Please do not name the employer.*

Dates Worked	Title	Type of Work	Duties	City

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16. If you are married or living with someone, what is that person's employment status and what type of work does he or she do? (If he or she is not working now, please indicate the type of prior work done) *Please do not name the employer:*

17. Have you, or a close family member, or close friend, ever served in the military, including the Reserves, National Guard or ROTC? (*Please do not list names*)

☐ Yes ☐ No

Person's Relationship to You	Branch	Rank	Location	Duties	Dates of Service	Type of Discharge

- (a) Have you, a close family member or close friend, ever served in a combat or military zone whether in Iraq, Afghanistan, Kuwait or elsewhere?

☐ Yes ☐ No

If yes, where and when? _____

What was that person's relationship to you (if any)? _____

- (b) Do you know anyone who was injured or killed while serving?

☐ Yes ☐ No

If yes, where and when? _____

What was that person's relationship to you (if any)? _____

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- _____
- (c) Did you ever serve in the Military Police or on a Court Martial?
☐ Yes ☐ No

If yes, where and when? _____

18. Have you, any of your family members or close friends ever served in the military of another country?

If yes, what is that person's relationship to you? _____

If yes, in which country's military did that person serve? _____

19. Have you, any of your family members or close friends ever worked for the Federal Bureau of Investigation (FBI), the U.S. Department of State, the office of any federal or state prosecutor or any law enforcement agency?

☐ Yes (self) ☐ Yes (family) ☐ Yes (friend) ☐ No

If 'yes,' please explain:

20. Have you, any of your family members or close friends ever worked for a corporation or business that contracts with any government, national security, intelligence, defense, law enforcement, or military agency?

☐ Yes (self) ☐ Yes (family) ☐ Yes (friend) ☐ No

If 'yes,' please explain:

21. Have you ever had any education or training in the following areas? (please check all that apply)

☐ Law / Legal Field

☐ Criminal Justice / Law Enforcement

☐ Security / Intelligence

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- ☐ Private Investigations
- ☐ Corrections / Jails / Prisons
- ☐ Firearms / Explosives
- ☐ Firefighting, Rescue Squad or EMT
- ☐ Engineering
- ☐ Political Science / Foreign Affairs
- ☐ Religion or Philosophy (other than attending religious services)
- ☐ Mass Transportation
- ☐ Transporting / Maintaining Gas Pipelines
- ☐ Aircraft / Airline Industry / Aviation
- ☐ Counseling, Psychology, Psychiatry,
Mental Health or Social Services
- ☐ Medicine
- ☐ Journalism
- ☐ Religious Ministry
- ☐ Tourism

(a) If you answer 'yes' to any of the above, please state the nature of the training:

22. Have you previously traveled outside the United States?

☐ Yes ☐ No

If 'yes,' please describe where and approximately when?

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23. Do you think the United States should be more involved in the affairs of other countries, about the same, or less involved?

☐ More involved ☐ About the same ☐ Less involved

24. If you could travel anywhere in the world, where would you go and what would you do while you were there?

25. With what religious belief, if any, do you most identify?

26. With what religious belief, if any, did the household in which you grew up most identify?

27. With what religious belief, if any, does your spouse or significant other identify?

28. Please indicate the religions with which the members of your family identify:

Father _____

Mother _____

Maternal grandmother (mother's mother): _____

Maternal grandfather (mother's father): _____

Paternal grandmother (father's mother): _____

Paternal grandfather (father's father): _____

29. On the scale below, where 1 is "not at all" and 5 "very," how religious do you consider yourself? (Please circle a number on the scale below.)

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Not at all religious	Somewhat religious	Very religious
1	2	3
4	5	

30. On the scale below, where 1 is “not at all” and 5 “very,” how important was religion **in the household in which you grew up?** (Please circle a number on the scale below.)

Not at all important	Somewhat important	Very important
1	2	3
4	5	

31. On the scale below, where 1 is “not at all” and 5 “very,” how important is religion **to your spouse or significant other?** (Please circle a number on the scale below.)

Not at all important	Somewhat important	Very important
1	2	3
4	5	

32. (a) How often do you currently attend religious services?

☐ Regularly ☐ Occasionally ☐ Seldom ☐ Never

(b) Growing up, how often did you attend religious services?

☐ Regularly ☐ Occasionally ☐ Seldom ☐ Never

(c) Have you or anyone in your family ever studied for or served in any position of responsibility in your religious organization?

☐ Yes ☐ No

If ‘yes,’ please explain: _____

(d) Do you belong to any religious study group?

☐ Yes ☐ No

(e) Do you donate money to any house of worship or religious organization?

☐ Yes ☐ No

If yes, which one(s)? _____

(f) Have you ever felt discriminated against because of your religious beliefs:

☐ Yes ☐ No

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If 'yes,' please explain: _____

(g) Describe the importance, if any, of religion in your life.

33. Is there any religious, racial or ethnic group that you do not feel comfortable being around?

[] Yes [] No

If yes, please explain: _____

34. In general, what is your opinion of those who are highly devoted to their religious beliefs?

☐ Extremely negative ☐ Extremely positive

☐ Somewhat negative ☐ Somewhat positive

☐ Slightly negative ☐ Slightly positive

☐ I am neutral ☐ I have no opinion

35. Have you personally ever had an especially positive or negative experience with someone because he or she was of a different religious belief than your own?

☐ Yes ☐ No

If yes, please describe what happened: _____

36. Have you ever felt excluded or isolated because of your religious beliefs, or lack thereof?

☐ Yes ☐ No

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If yes, please describe the circumstances: _____

37. Do you, or does anyone in your household, or a close friend own firearms?

[] Yes [] No

If 'yes,' state how many and what type, and reason for ownership:

38. Do you have experience using firearms?

[] Yes [] No

If 'yes,' what type and for what purpose:

39. Do you or does anyone in your household have any experience with explosives?

[] Yes [] No

If 'yes,' please explain:

[please continue the questionnaire on the next page]

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HOBBIES AND ACTIVITIES

40. What community, civic, social, union, professional, fraternal, political, religious or recreational organizations do you belong to (e.g., PTA, Kiwanis, American Legion, Hadassah, NRA, NEA, Knights of Columbus, etc.)?

Have you held any offices or positions of leadership in any such organization?

[] Yes [] No

If yes, please describe: _____

What community, civic, social, union, professional, fraternal, political or religious organizations does your spouse or significant other belong to and what leadership positions, if any, have been held?

41. What are your hobbies/interests? What do you like to do in your spare time?

42. What television shows do you watch most often? _____

43. What magazines, journals or websites do you read most often? _____

44. What newspapers do you read most often? _____

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45. What kind of books do you read most often? _____

46. What television news programs, radio programs, or internet websites do you watch, listen to, or visit on a regular basis? _____

47. What radio programs do you listen to most often? _____

48. What are your primary sources of local, national, and international news? _____

49. Have you ever called in to a talk show, written a letter to the editor or participated in any web-blogs or chat rooms on the internet?

[] Yes [] No

If yes, which ones?

What topic do you usually address: _____

50. Have you ever visited any of the following websites? (Please check all that apply.)

☐ stormfront.org ☐ jewwatch.com ☐ vanguardnewsnetwork.com

☐ electronicintifada.net ☐ pro-israel.org ☐ AIPAC.org

☐ zoa.com ☐ dennisprager.com

☐ I have not visited any of these websites.

If you checked any of the websites above, please indicate how often you visit this (these) sites (e.g., daily, often, occasionally, rarely):

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51. Have you ever been a member of, or otherwise involved with, any group that: (check all that apply)

☐ takes a position on social or legal issues? (e.g., gun control/right to bear arms, health care, abortion, tax policy, etc.)

☐ focuses on crime prevention (e.g., neighborhood watch, crime stoppers, etc.)

☐ focuses on victims' rights (e.g., shelters or crisis centers, etc.)

If any, please indicate the name(s) of the organization(s):

52. How often do you seek out positions of leadership at work or with other group activities:

☐ always ☐ often ☐ sometimes ☐ seldom ☐ never

[please continue the questionnaire on the next page]

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LEGAL EXPERIENCE

53. Have you ever served as a juror?

☐ Yes, at trial ☐ Yes, on a grand jury ☐ No

Please complete for each case on which you have served: (Please do not state what verdict, if any, you reached in any case).

Year	Civil, Criminal or Grand Jury	State or Federal	Nature of the case	Reach a Verdict? (Yes or No Only)	Were you Foreperson? (Yes or No Only)	Positive or Negative Experience

Is there anything about your experience as a juror that would make you not want to serve again, or that affected your opinion about the jury system?

☐ Yes ☐ No

If yes, please explain: _____

Is there anything about your experience as a juror that would make it difficult for you to sit as a fair and impartial juror in this case?

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[] Yes

[] No

If yes, please explain: _____

54. Have you, or anyone close to you, ever been the victim of or witness to a crime, whether or not that crime was reported to law enforcement?

[] Yes

[] No

Please complete for each incident, but do not include the person's name:

Person's relation to you	Victim/Witness	Type of Crime	Reported: Yes or No	Testify: Yes or No	Outcome

What are your opinions or attitudes toward law enforcement and / or the justice system as a result of the incidents mentioned above?

Is there anything about the incidents discussed above that would make it difficult for you to sit as a fair and impartial juror in this case?

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[] Yes

[] No

If yes, please explain: _____

55. If you or someone close to you (family or close friend) has been the victim of a violent crime, was the victim attacked as a result of his/her race, ethnicity, or religious beliefs?

☐ Yes ☐ No

☐ Neither I nor someone close to me has been the victim of a violent crime

If you answered Yes, please describe the role that the victim's race, ethnicity, or religious beliefs played in the attack:

56. If you or someone close to you (family or close friend) has been the victim of a violent crime, was the person(s) responsible ever brought to justice?

☐ Yes ☐ No

☐ Neither I nor someone close to me has been the victim of a violent crime

If you answered Yes or No, please describe what happened: _____

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57. Have you ever appeared or testified in any legal proceeding or investigation for any reason, whether as a plaintiff, defendant, victim, or witness?

[] Yes [] No

If yes, please explain:_____

Is there anything about that experience that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes [] No

If yes, please explain:_____

58. Have you or anyone in your family ever sued anyone or been sued by anyone?

[] Yes (self) [] Yes (family) [] No

If yes, were you/they: _____Sued _____Been Sued _____Both

If yes, (family), who (relationship to you):_____

Please explain, including nature and outcome of the case:_____

Were you/they satisfied with the outcome? [] Yes [] No

59. Have you ever been questioned or subpoenaed in any matter by the New York City Police Department, any state or local enforcement agency, the Department of Justice or any United States investigative agency (e.g., the FBI, DEA, IRS, Customs Service, etc.)?

[] Yes [] No

If yes, please explain:_____

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Do you feel that you were treated fairly in connection with that matter or matters?

[] Yes [] No

If yes, please explain:_____

60. Are you, or anyone close to you, including family and friends, now under subpoena to testify in any civil or criminal case?

[] Yes [] No

If yes, please explain:_____

61. Have you ever filed a complaint with the police against anyone?

[] Yes [] No

If 'yes,' please describe:

Is there anything about that situation that would impact your ability to be a fair and impartial juror in this case?

[] Yes [] No

If 'yes,' please explain:

62. Have you, or has a family member or close friend, ever been involved in or been the target of a criminal investigation?

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Yes (self) _____ Yes (family/friend) _____ No _____

If 'yes,' without mentioning names, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved:

63. Have you, or has a family member or close friend, ever been charged with a crime?

Yes (self) _____ Yes (family/friend) _____ No _____

If 'yes,' without mentioning names, please generally describe the circumstances surrounding the criminal investigation(s) and your relationship(s) to the person(s) involved:

64. If you answered "yes" to ____ or ____ above, was the individual who was investigated or charged treated fairly by the criminal justice system:

[] Yes [] No

If 'no,' please explain:

65. How do you feel about the number of lawsuits filed in recent years? (mark one)

Much too high []

Somewhat high []

About right []

Somewhat low []

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Much too low ☐ []

Don't know ☐ []

Other, specify: _____

66. How do you feel about the amount of money awarded in lawsuits in recent years? (mark one)

Much too high ☐ []

Somewhat high ☐ []

About right ☐ []

Somewhat low ☐ []

Much too low ☐ []

Don't know ☐ []

Other, specify: _____

67. Do you have any strong feelings or beliefs for or against awarding monetary damages for personal injury, pain or suffering?

☐ [] Yes

☐ [] No

If yes, please explain: _____

68. Do you have any strong feeling or beliefs for or against awarding monetary damages for mental, psychological or psychiatric injuries?

☐ [] Yes

☐ [] No

If yes, please explain: _____

69. Have you or an immediate family member ever had an injury as a result of someone else's negligent, reckless or intentional conduct?

Circle One: Yes or No.

If yes, please describe the circumstances.

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70. Does the fact that a case makes it to trial lead you to believe the plaintiff probably has a legitimate claim?

☐ Yes ☐ No ☐ No opinion

If yes, please explain: _____

[please continue the questionnaire on the next page]

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CONTACT WITH COURT AND PARTIES

71. Please indicate if you, or any of your relatives or friends, knows or has a connection to, or has read or heard anything about any of the following people, or any of their relatives or friends:

(a) The presiding U.S. District Court Judge,
Hon. George B. Daniels ☐ Yes ☐ No
Any members of his staff ☐ Yes ☐ No

(b) Anyone who works in this Federal Courthouse ☐ Yes ☐ No

(c) Magistrate Judge Ronald L. Ellis ☐ Yes ☐ No
Any members of his staff ☐ Yes ☐ No

(d) Plaintiffs' Attorneys and Staff:

Arnold & Porter LLP:

Ken L. Hashimoto
Philip W. Horton
Michael Kientzle
Tal R. Machnes
Lucy S. McMillan
Sara K. Pildis
Carmela T. Romeo
Kent A. Yalowitz

Law Offices of Nitsana Darshan-Leitner:

Nitsana Darshan-Leitner
Mordechai Haller
Avi Leitner
Dina Rovner
Rachel M. Weiser

The Berkman Law Office, LLC:

Robert J. Tolchin

☐ Yes ☐ No

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(e) Defense Attorneys and Staff:

Miller Chevalier:

Laura G. Ferguson
Richard A. Hibey
Brian A. Hill
Lamia Rita Matta
Dawn E. Murphy-Johnson
Timothy P. O'Toole
Matthew T. Reinhart
Mark J. Rochon
Michael Satin
Andrew Todd Wise

☐ Yes ☐ No

If yes, please explain: _____

72. Please indicate if you, or any of your relatives or friends, knows or has a connection to, or has read or heard anything about any of the following people, or any of their relatives or friends:

Katherine Baker
Alan J. Bauer
Binyamin Bauer
Daniel Bauer
Revital Bauer
Yehonathon Bauer
Yehuda Bauer
Rebekah Blutstein
Richard Blutstein
Larry Carter
Shaun Coffel
Robert L. Coulter, Sr
Robert L. Coulter, Jr
Dianne Coulter Miller
Chana Bracha Goldberg
Eliezer Simcha Goldberg
Esther Zahava Goldberg
Karen Goldberg

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Shoshana Malka Goldberg
Tzvi Yehoshua Goldberg
Yaakov Moshe Goldberg
Yitzhak Shalom Goldberg
Elise Janet Gould
Ronald Allan Gould
Shayna Eileen Gould
Nevenka Gritz
Oz Joseph Guetta
Varda Guetta
Leonard Mandelkorn
Nurit Mandelkorn
Shaul Mandelkorn
Henna Novack Waldman
Jessica Rine
Elana R. Sokolow
Jamie A. Sokolow
Lauren M. Sokolow
Mark I. Sokolow
Rena M. Sokolow
Eva Waldman
Morris Waldman
Shmuel Waldman

[] Yes

[] No

If 'yes,' please indicate what connection you have, or what you read, watched or heard:

What stands out most in your mind about what you have read, seen or heard?

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Please also indicate the source of your information (e.g., newspaper, television, radio, magazines, internet, friends, word of mouth, etc.):

73. At any time, have you read any articles or internet blogs, seen any news programs, talked about with friends, co-workers or family members or overheard discussions regarding the Palestine Liberation Organization or the Palestinian Authority?

☐ Yes ☐ No

If 'yes,' please indicate what you read, watched or heard: _____

What stands out most in your mind about what you have read, seen or heard?

Please also indicate the source of your information (e.g., newspaper, television, radio, magazines, internet, friends, word of mouth, etc.):

74. Have you formed any opinions about this case based on anything you have read, seen or heard in the media?

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[please continue the questionnaire on the next page]

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WITNESSES, EVIDENCE AND LEGAL PRINCIPLES

75. The complaint that was filed in this case is the means by which the plaintiffs give the defendants notice of the **civil** allegations against them and brings them before the court. The complaint is an accusation, and nothing more. The complaint is not evidence and the jury must not give it any weight in arriving at its verdict.

Will you be able to follow this rule of law?

[] Yes [] No

If 'no,' please explain: _____

76. You may hear testimony from or about the people listed on Attachment A during the trial. Please turn to Attachment A at the end of this packet, and circle the name of any person that you know or have any connection with.

Have you read or heard about someone on the list?

[] Yes [] No

If 'yes,' please explain and indicate the name of the person:

If yes, does your familiarity with any of the people on the list cause you to have an opinion about this case:

[] Yes [] No

Please explain: _____

77. Do you have any religious, philosophical, moral or other belief that might make you unable to render a verdict for reasons unrelated to the law and evidence?

[] Yes [] No

If 'yes,' please explain:

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-
-
78. The jurors are the sole judges of the facts. However, the jury must accept and follow the principles of law as instructed by the judge. The jury may not follow some rules and ignore others. Even if the jury disagrees or dislikes the rules of law or does not understand the reasons for some of the rules, it is their duty to follow them. Do you have any personal beliefs that would make it difficult to follow the court's legal instructions, whatever they may be?

[] Yes [] No

If 'yes,' please explain:

-
-
79. Under the law, the facts are for the jury to determine and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions.

Would you have any difficulty following the Judge's instructions:

[] Yes [] No

If 'yes,' please explain:

-
-
80. As a potential juror in this case, you must avoid reading, viewing or listening to any and all media coverage of this case in any form. You may not use the internet, or any other electronic means, to research any aspect of this case. In other words, you are forbidden from reading any magazine, newspaper, website or search engine about this case. You may not Google this case or email or use instant messaging, facebook, blog/tweet about it or talk about it with anyone by computer, cell phone, or any other electronic device. Do you have any reservations or concerns about your ability or willingness to follow this instruction?

[] Yes [] No

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If 'yes,' please explain:

Will you immediately inform the Court if you are exposed to any such coverage, or make any postings whether accidentally or otherwise?

☐ Yes ☐ No

81. The Court will instruct you not to discuss the case with anyone during the trial, including your fellow jurors, and that you may discuss the case with your fellow jurors only after the judge directs you to begin your deliberations at the end of the case. Will you have any difficulty following the Court's instructions?

☐ Yes ☐ No

If 'yes,' please explain:

82. If you were chosen to serve as a juror on this case, would you be influenced in any way by the feelings or opinions of family, friends, or co-workers, members of your religious community, or anyone else?

☐ Yes ☐ No

Would you feel pressure to explain your vote to family, friends, co-workers, members of your religious community, or anyone else?

☐ Yes ☐ No

If 'yes,' please explain:

83. Is there anything about the nature of the case, questions in this jury questionnaire as it [they] has [have] been explained to you thus far that causes you to doubt your ability to be fair and impartial?

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☐ Yes

☐ No

If 'yes,' please explain:

84. Is there any other matter that you should bring to the Court's attention that may have any bearing on your qualifications as a juror or may affect your ability to render a fair and impartial verdict based solely on the evidence and the Court's instructions on the law?

☐ Yes

☐ No

If 'yes,' please explain:

[please continue the questionnaire on the next page]

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CASE SPECIFIC

85. Have you, or has a family member or close friend, ever lived, worked or studied in Israel, the West Bank, the Gaza Strip, or another place in the Middle East?

[] Yes

[] No

If 'yes,' list the country, who worked or studied there, when, and the nature of the work or study:

Is there anything about that experience that would make it difficult for you to sit as a fair and impartial juror in this case?

[] Yes

[] No

If 'yes,' please explain:_____

86. Do you know anyone who presently resides in Israel, the West Bank, the Gaza Strip, or another place in the Middle East?

If 'yes,' is it a friend, relative, or colleague? In what country does each person live?

If yes, has that individual served in the military there? If so, which military?

87. Is there anything about your relationship with that person that would affect your ability to be fair and impartial in this case?

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[] Yes

[] No

If 'yes,' please explain: _____

88. The acts alleged in the Complaint are alleged to have occurred in and around Jerusalem. Are you familiar with Jerusalem and its surrounding areas?

[] Yes

[] No

If 'yes,' please explain how you are familiar with that area(s) (without providing a specific address or otherwise revealing your identity):

Is there anything about your familiarity with the area(s) that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

[] Yes

[] No

If 'yes,' please explain:

89. Do you personally know people who are Palestinian?

☐

Yes

☐

No

If yes, what is your relationship with this person/people? (Please check all that apply.)

☐

Family

☐

Friends

☐

Spouse

☐

In-laws

☐

Neighbors

☐

Co-workers

☐

Business Associates

☐

Other

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In general, what is your opinion of Palestinian people?

Negative	Neutral			Positive
1	2	3	4	5

Is there anything about your opinion of Palestinian people that would keep you from being impartial in this case?

[] Yes [] No

90. Do you personally know people who are Muslim (followers of Islam)?

☐ Yes ☐ No

If yes, what is your relationship with this person/people? (Please check all that apply.)

☐ Family ☐ Friends ☐ Spouse
☐ In-laws ☐ Neighbors ☐ Co-workers
☐ Business Associates ☐ Other

In general, what is your opinion of Muslim people?

Negative	Neutral			Positive
1	2	3	4	5

Is there anything about your opinion of Muslim people that would keep you from being impartial in this case?

[] Yes [] No

91. Do you personally know people who are Israeli?

☐ Yes ☐ No

If yes, what is your relationship with this person/people? (Please check all that apply.)

☐ Family ☐ Friends ☐ Spouse
☐ ☐ ☐

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☐ In-laws ☐ Neighbors ☐ Co-workers

☐ Business Associates ☐ Other

In general, what is your opinion of Israeli people?

Negative	Neutral			Positive
1	2	3	4	5

Is there anything about your opinion of Israeli people that would keep you from being impartial in this case?

☐ Yes ☐ No

92. Do you personally know people who are Jewish?

☐ Yes ☐ No

If yes, what is your relationship with this person/people? (Please check all that apply.)

☐ Family ☐ Friends ☐ Spouse

☐ In-laws ☐ Neighbors ☐ Co-workers

☐ Business Associates ☐ Other

In general, what is your opinion of Jewish people?

Negative	Neutral			Positive
1	2	3	4	5

Is there anything about your opinion of Jewish people that would keep you from being impartial in this case?

☐ Yes ☐ No

93. Have you or any of your family members or close friends ever donated time or money to charities or relief agencies providing support for Palestine, Palestinian refugees, the

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Palestinian Authority, Palestinian organizations, or any organization that provides assistance to Palestine or the Palestinian people?

☐ Yes (self) ☐ Yes (family) ☐ Yes (friend) ☐ No

If yes, please explain: _____

94. Have you or any of your family members or close friends ever donated time or money to charities or relief agencies providing support for Israel, Jewish immigrants to Israel, Jewish organizations, or any organization that provides assistance to Israel or the Jewish people?

☐ Yes (self) ☐ Yes (family) ☐ Yes (friend) ☐ No

If yes, please explain: _____

95. Do you have any feelings about the Muslim faith that will affect your ability to be fair and impartial in this case?

[] Yes [] No

If yes, please explain: _____

96. Have you or anyone close to you had any experiences, feelings or impressions about Muslims that would make it difficult for you to listen to evidence with an open mind in this case?

[] Yes [] No

If yes, please explain: _____

97. Do you have any feelings about the Jewish faith that will affect your ability to be fair and impartial in this case?

[] Yes [] No

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If yes, please explain: _____

98. Have you or anyone close to you had any experiences, feelings or impressions about Jews that would make it difficult for you to listen to evidence with an open mind in this case?

[] Yes [] No

If yes, please explain: _____

99. Do you follow media reports relating to terrorist acts or pending civil or criminal cases against people charged with committing terrorist acts or any other terrorism related topics?

[] Yes [] No

If yes, please explain: _____

How closely do you follow news stories in the media about terrorism or terrorist organizations and the war on terrorism?

[] Very closely [] Not very closely

[] Somewhat closely [] Not at all closely

100. Have you ever written to any elected or appointed government official, newspaper or magazine, or called in to a television or radio program or written to any internet chat room or blog to express your opinion about terrorism, or the U.S. efforts to combat terrorism?

[] Yes [] No

If 'yes,' please indicate what opinions you expressed and over what media:

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101. Using the scale below, where “1” is “not at all informed” and “5” is “very informed,” please check one box in each row to indicate how informed you are about the topics listed in the column on left:

	1 not at all informed	2	3	4	5 very informed
Palestinian Territories					
Palestinian Authority (PA)					
Palestine Liberation Organization (PLO)					
Mahmoud Abbas					
Fatah					
Yasser Arafat					
Al Aqsa Martyrs Brigade					
Hamas					
State of Israel					
Ehud Olmert					

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Ariel Sharon					
Zionism					

102. Using the scale below, where “1” is “very unfavorable,” “4” is “very favorable,” and “5” is “no opinion,” please check one box in each row to indicate your impression of the topics listed in the column on left:

	1 Very unfavorable	2	3	4 Very favorable	5 No opinion
Palestinian Territories					
Palestinian Authority (PA)					
Palestine Liberation Organization (PLO)					
Mahmoud Abbas					
Fatah					
Yasser Arafat					
Al Aqsa Martyrs Brigade					
Hamas					
State of Israel					

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Ehud Olmert					
Ariel Sharon					
Zionism					

103. Is there anything about your familiarity or impressions of any of the topics listed above that would keep you from being an impartial juror in this case?

If yes, please explain below: _____

104. Using the scale below, where 1 is “not at all” and 5 is “very,” how well-informed would you say you are about **the Israeli/Palestinian conflict**? (Please circle a number on the scale below.)

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Not at all familiar	Somewhat familiar			Very familiar
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1	2	3	4	5

105. Based on what you have seen, heard, or read about the Israeli/Palestinian conflict, which side in the conflict do you favor?

<input type="checkbox"/> Strongly favor Israel	<input type="checkbox"/> Strongly favor the Palestinians
<input type="checkbox"/> Somewhat favor Israel	<input type="checkbox"/> Somewhat favor the Palestinians
<input type="checkbox"/> Slightly favor Israel	<input type="checkbox"/> Slightly favor the Palestinians
<input type="checkbox"/> I am neutral	<input type="checkbox"/> I have no opinion

106. What, if anything, have you seen, heard, or read about the Israeli/Palestinian conflict that causes you to have that opinion, if any? Please describe.

107. Who do you think is MOST to blame for the continuing conflict between the Israelis and the Palestinians?

<input type="checkbox"/> The Israelis	<input type="checkbox"/> The Palestinians	<input type="checkbox"/> I have no opinion
---------------------------------------	---	--

108. Is there anything about your opinions of the Israeli/Palestinian conflict that would keep you from being an impartial jury in this case?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
------------------------------	-----------------------------	-----------------------------------

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109. What, if anything, have you seen, heard, or read about shooting or bombing attacks in Israel in the past 15 years?

110. Based on what have you seen, heard, or read about shooting or bombing attacks in Israel in the past 15 years, have you formulated an opinion about who is responsible for those attacks?

☐ Yes ☐ No

If yes, please explain: _____

111. Do you **personally** know anyone who was killed or injured in a shooting or bombing attack in Israel?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s): _____

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112. Do you know anyone whose friend or loved one was killed or injured in a shooting or bombing attack in Israel?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s) and their relationship to the victim:

113. Did you **personally** know anyone who was killed in the attacks on September 11, 2001 or in any other terrorist attack?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s): _____

114. Did you know anyone who lost a friend or loved one in the attacks on September 11, 2001 or in any other terrorist attack?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s) and their relationship to the victim:

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115. If you or someone you know lost a friend or loved one in any terrorist attack, would that impair your ability to be fair and impartial in a case involving terrorist acts?

[] Yes [] No [] Not sure

If yes, please explain:_____

116. Have you, any of your family members or close friends ever had any training, education or employment that involved any aspect of dealing with terrorism?

☐ Yes (self) ☐ Yes (family) ☐ Yes (friend) ☐ No

If yes, please describe:

117. Do you have any relationship with, or any bias, sympathy, or prejudice with reference to the Palestine Liberation Organization or the Palestinian Authority that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

[] Yes [] No

If 'yes,' please explain:

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118. Do you have any bias, sympathy, or prejudice with reference to Americans who visit or live in Israel that would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?

☐ Yes ☐ No

If 'yes,' please explain:

119. Do you have any feelings about Israelis, Jews, Arabs, Muslims, Palestinians, or the Jewish or Muslim religions that would make it difficult for you to listen to evidence and decide a case with an open mind?

☐ Yes ☐ No

If yes, please explain: _____

120. The defendants have been sued in a civil case based on terrorist attacks in Israel against American citizens. Is there anything about the nature of this lawsuit that would interfere with your ability to decide, based solely on the evidence, whether the plaintiffs have proven their case?

☐ Yes ☐ No

If yes, please explain: _____

121. Is there any other matter that you should call to the Court's attention that may have any bearing on your qualifications as a juror or that may affect your ability to render an impartial verdict based solely on the evidence and the Court's instructions on the law?

☐ Yes ☐ No

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If 'yes,' please describe:

122. Is there any matter you would prefer to discuss privately with the Judge?

☐ Yes

☐ No

[please continue the questionnaire on the next page]

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SCHEDULING AND HARDSHIP INFORMATION

Jury selection will begin on January 12, 2015. The jury selection process will last approximately one week and the trial will commence immediately afterward. Trial usually will be in session ____ days per week from ____ a.m. to approximately ____ p.m. There may be some court-scheduled breaks. It is expected that the trial will last 12 weeks. To be on the safe side, we are requiring that the jurors who serve on this case be available through _____.

If you are selected as a juror, you will be required to be present for the taking of all testimony for as long as the case lasts. **There are no plans to sequester the jury during the trial, which means you will go home every day after court.**

The Court views jury service in a federal trial to be one of the highest duties a citizen owes to the United States. Mere inconvenience or the usual financial hardships of jury service will not be sufficient to excuse a prospective juror.

Please complete the following:

1. Do you have an unusual financial hardship or other serious problem that would prevent you from serving as a juror in this case?

[] Yes [] No

If 'yes,' please explain briefly the nature of the hardship: _____

2. Do you have any difficulty speaking, reading or understanding English?

[] Yes [] No

If 'yes,' please explain: _____

3. Do you have any physical problem (for example, sight, hearing, inability to sit for long periods of time) or emotional problem that would interfere with your ability to serve?

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☐ Yes

☐ No

If 'yes,' please describe: _____

4. If you currently visit with a doctor or other medical professional on a regular basis, would those visits interfere with your ability to serve?

☐ Yes

☐ No

If 'yes,' please briefly describe how often these visits occur and why they would interfere with your ability to serve:

5. Are you taking any medication that could affect your ability to serve as a juror?

☐ Yes

☐ No

If 'yes,' please explain: _____

6. Do you have any dietary or physical restrictions that need to be accommodated?

☐ Yes

☐ No

If 'yes,' please explain: _____

7. Is there any reason why you think you cannot serve on the jury?

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Additional Pages to Complete Responses to any Question

[illegible]